

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ANDREW J. DAVISON)	CASE NO. 1:24CV00227
)	
Plaintiff,)	JUDGE PAMELA A. BARKER
)	
v.)	Magistrate Judge Parker
)	
CITY OF LORAIN, et al.)	<u>MOTION TO DISMISS</u>
)	
Defendants.)	
)	
)	
)	

Now come Defendants, the City of Lorain (individually, the “City”), Cielo Rodriguez (individually “Rodriguez”), Mallory Santiago (individually “Santiago”), Patrick Riley (individually “Riley”), and Brent Payne (individually “Payne”) (hereinafter collectively referred to as “City Defendants”), by and through undersigned counsel, and hereby move this Honorable Court for an Order dismissing Plaintiff’s Complaint as it relates to all pending claims against City Defendants for the reasons set forth more fully in the attached Memorandum in Support of City Defendants’ Motion to Dismiss.

WHEREFORE, City Defendants respectfully move this Honorable Court for an Order dismissing Plaintiff’s Complaint as it relates to all pending claims against City Defendants.

Respectfully submitted,

[SIGNATURE BLOCK ON THE FOLLOWING PAGE]

/s/ Joseph H. Pritchard
Joseph H. Pritchard (0101301)
Assistant Lorain Law Director
Joseph T. LaVeck (0092326)
Assistant Lorain Law Director
200 West Erie Ave., 3rd Floor
Lorain, Ohio 44052
Ph: (440) 204-2250
Fax: (440) 204-2257
E: Joseph_Pritchard@cityoflorain.org
Joseph_LaVeck@cityoflorain.org
Attorneys for City Defendants